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- in the marketplace, I needed to update some of my 1
- skills. So they guided me through that process. 2
- Q. What was the name of this career counselor? 3
- A. It's -- I believe North Shore Career Center in 4
- 5 Salem.
- Q. Did you pay a fee for this service? 6
- 7 A. No.
- Q. Are you claiming that you suffered emotional 8
- distress damages because of your employment at 9
- Jansson? 10
- 11 A. Yes.
- Q. What conduct do you claim caused you to suffer 12
- emotional distress? 13
- A. I'm sorry? What do you mean by "what conduct"? 14
- O. What caused you stress, distress? 15
- A. Finance. Finances. The lack of. 16
- Q. What did Jansson do to cause you distress 17
- regarding your finances? 18
- A. Not working with them anymore. 19
- Q. Have you been to see a doctor, psychologist or 20
- counselor about emotional distress issues you 21
- claim to have suffered in connection with your 22
- employment at Jansson? 23
- 24 A. No.

- A. At that time I said I would write one.
- 2 Q. And did you?
- 3 A. No, I did not.
- Q. Why did she ask you to write a letter of 4
- resignation? 5
- A. Because when she asked me to leave and I got up 6

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- 7 to leave, when I opened the door, she said, I
- 8 want you to write me a letter of resignation.
- And I said, Fine. I'll take care of it over the 9
- 10 weekend.
- Q. But you're claiming now that you didn't resign; 11
- 12 is that correct?
- A. Well, when I thought about it over the weekend, I 13
- felt that I wasn't resigning from my position. I 14
- wanted to work my position. 15
- O. But you wanted to work your position at \$25 an 16
- hour; isn't that correct? 17
- A. Yes. 18
- Q. And you weren't going to work your position for 19
- \$22 an hour, were you? 20
- A. Well, that was the disagreement that we were 21
- trying to resolve. 22
- 23 Q. And from your perspective, there was no
- resolution of that because Arlene didn't agree to 24

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2

3

5 6

- Q. I would like to get some more detail from you 1
- regarding your claim of emotional distress or 2
- mental anguish. Would you describe for me the 3
- 4 symptoms that you experienced -- let's start with
- 5 from December, 2001 until September, 2003 when
- 6 you started your new job?
- A. I'm sorry. Can you rephrase --7
- 8 Q. I would like for you to describe for me the
- symptoms that you have experienced of emotional 9
- 10 distress.
- A. From what dates? 11
- Q. From December, 2001 to September of 2003. 12
- A. Well, it was after December 7th that the 13
- emotional distress started. 14
- Q. How did it manifest itself? What did you 15
- experience? 16
- A. Well, when Arlene asked me to write a letter of 17
- resignation, which was the final say of not being 18
- 19 employed by Jansson any longer, I was not
- financially prepared to not have a job. 20
- Q. Let's talk about that letter. When did she ask 21
- you to write a letter of resignation? 22
- A. That Friday, December 7th. 23
- 24 Q. What was your response?

- pay you \$25 an hour, did she? 1
 - A. At that time, we weren't coming up with a new
 - agreement. We weren't resolving it.
- Q. You walked out when she said you weren't going to 4
 - get paid \$25 an hour. Isn't that true?
 - MS. DEVER: Objection.
- 7 A. I walked out when she asked me to leave.
- Q. Isn't it true that she asked you to leave now as 8
- 9 opposed to working for two weeks after you had
- given your two-week notice saying that it was 10
- 11 unnecessary for you to stay for the two weeks?
- Isn't that correct? 12
- 13 A. She said it was unnecessary. I offered to help
- if she needed it. When I was getting up to leave 14
- on my way to the door, I said, If you need help, 15
- if you would like me to stay for two weeks and 16
- help -- or to the end of the month is I believe 17
- what I said. I didn't say two weeks. 18
- If you would like me to stay to the end 19 of the month and help through the transition, I 20
- would be happy to do that. 21
- Q. But the only transition is because you told her 22
- 23 you were submitting your resignation; isn't that
- 24 correct?

21 (Pages 78 to 81)

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- 1 A. She said that after.
- 2 Q. But you agreed you were going to give her a
- 3 resignation notice, correct?
- 4 A. I did agree I would write one.
- 5 Q. Isn't it true Miss Osoff told you she didn't want
- 6 you to leave?
- 7 A. Yes. She did say that.
- 8 Q. Okay. Didn't she also tell you she didn't think
- 9 you wanted to leave either?
- 10 A. That's true.
- 11 Q. Isn't it true that you said that your demands
- were not negotiable and that you were leaving on
- 13 December 7th?
- 14 A. No. I didn't say that.
- 15 Q. When Ms. Osoff told you that you could simply
- leave and not come back, it was because she said
- if you're really resigning, you can simply leave
- and not come back; isn't that correct?
- 19 A. I'm not sure if it was said in those exact words.
- 20 Q. Something to that effect?
- 21 A. Yes.
- 22 Q. Now, Miss Osoff hadn't hired a replacement for

between December 7th and the end of the year?

for several weeks and there were two main

A. Yes. Because after the Christmas rush the

A. Yes. Because I was just returning from being out

catalogs that needed to be somewhat established

pressroom was available and I wanted to expedite

emotional distress damages or symptoms, I guess,

and what I would like to ask you in a little bit

symptoms, if any, did you experience after you

more detail about is what kinds of physical

left your employment in December of 2001.

pregnant. I was starting a family. I was

concerned for their security. I also felt a

life. It's where I was expecting to spend

A. Very high level of anxiety. Uncertainty. I was

tremendous loss. Jansson was a big part of my

the work so it could get within that time frame.

Q. But you knew Miss Osoff was fully capable of

performing those duties; isn't that correct?

Q. Let's go back. We were talking about your

you at that time, had she?

before January.

Q. Before the end of the year?

24 A. No.

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23 24 A. Yes.

several years. And it was not there anymore.

- 2 Q. Any other symptoms that you experienced?
- 3 A. Because of the way the situation was handled, I

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- 4 developed a level of insecurity.
- 5 Q. What do you mean by that?
- 6 A. I was an extremely dedicated employee and I
 - worked very hard for the company. I excelled in
- 8 my position. And I felt there was only a
- 9 one-sided loyalty there from me.
- 10 Q. Anything else?
- 11 A. No.

7

- 12 Q. Did you ever take any medication as a result of
- your alleged mental anguish and emotional
- 14 distress?
- 15 A. I wasn't able to. I was pregnant.
- 16 Q. After you gave birth, did you take any
- 17 medication?
- 18 A. No.
- 19 Q. How long did these symptoms of anxiety,
- 20 insecurity, these things that you've been talking
- about, how long did they last?
- 22 A. To this very day.
- 23 Q. Have you ever taken any medication for any other
- 24 psychological problem at any time?

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- Q. Was there a lot of work that was going to happen 1 A. No.
 - 2 Q. And I think I asked you this, but have you seen a
 - 3 psychologist or counselor?
 - 4 MS. DEVER: Objection.
 - 5 You can answer.
 - 6 A. No, I don't.
 - 7 O. You have not?
 - 8 A. Yes. You asked that before. No, I have not.
 - 9 Q. Sorry.
 - 10 A. Sorry. I'm trying to follow you so --
 - 11 Q. Okay. Where were you born?
 - 12 A. Milton, Massachusetts.
 - 13 Q. Okay. And where have you lived in your life?
 - You lived in the area your whole life?
 - 15 A. Yes. In the Boston area. North of -- south of
 - the city and north of the city.
 - 17 Q. I think we talked a little bit about your
 - educational background. You have an Associate's
 - 19 degree in --
 - 20 A. Yes.
 - 21 Q. -- clothing design?
 - 22 A. Yes.
 - 23 Q. Did you graduate from high school on time?
 - 24 A. Yes.

22 (Pages 82 to 85)

-	Page 86		Page 88
		-	
1	Q. You have siblings?	1	Q. Doing the same thing?
2	A. Yes.	2	A. For one company, yes. And for another company, I
3	Q. How many?	3	touched on my retail experience.
4	A. Seven. I had seven. Sorry.	4	Q. Can you give me a range of the kinds of revenues
5	Q. Any learning disabilities as a child?	5	you were generating with your own business?
6	A. No.	6	A. Not a whole lot. Small. Small business.
7	Q. Did you have a happy childhood?	7	Q. More than 10,000 a year? A. Yes. But
8	A. Yes.	8	
9	Q. Did you have many friends growing up?	9	Q. More than 50?
10	A. Yes.	10	A. Under 50.
11	Q. Any health-related problems as a child?	11	Q. Under 50.
12	A. No.	12	A. Yes. It was very minimal.
13	Q. Any mental health issues or problems as a child?	13	Q. Okay. More than 20?
14	A. No.	14	A. Yes. Probably. Let's put it this way. In the
15	Q. Any problems related to your parents?	15	good years. There was always that start-up
16	A. No.	16	period, which I worked while I was starting it
17	Q. I would like you to describe your job history.	17	up. And there were a few years that this did
18	Let's just start from when you got your	18	pretty good. I just drew a very small paycheck
19	Associate's degree to Jansson.	19	because I pretty much put the money back into the
20	A. My first job out of college was with Louis of	20	company.
21	Boston. I went in as a salesperson. I was	21	Q. What do you think your best year was? Forty?
22	having a hard time breaking into the design field	22	A. It's been a long time. I don't really remember.
23	so I went into retail, which was part of my	23	Q. Okay. Fair enough.
24	major. I worked for them for six years.	24	A. I really don't.
	Page 87	THE PROPERTY OF THE PROPERTY O	Page 89
1	Q. Louis?	1	Q. I'm just trying to put bookends on it. That's
2	A. Louis of Boston. Louis Incorporated I believe it	1 _	
-	The Bould of Books and and a series	2	fine.
3	is		fine. A. I'm sorry. I really don't.
3	is. O Okav	3	A. I'm sorry. I really don't.
4	Q. Okay.	3 4	A. I'm sorry. I really don't.Q. All right. You said you did your design company
4 5	Q. Okay.A. I worked for them for six years. After that, I	3 4 5	A. I'm sorry. I really don't.Q. All right. You said you did your design company for ten years supplemented by various other
4 5 6	Q. Okay.A. I worked for them for six years. After that, I opened my own design company, which I worked for	3 4 5 6	A. I'm sorry. I really don't.Q. All right. You said you did your design company for ten years supplemented by various other part-time employment; is that correct?
4 5 6 7	Q. Okay.A. I worked for them for six years. After that, I opened my own design company, which I worked for I believe it was about ten years. And I	3 4 5 6 7	A. I'm sorry. I really don't.Q. All right. You said you did your design company for ten years supplemented by various other part-time employment; is that correct?A. Yes.
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Page 90 Page 92 bridal shops were already going under because of 1 come along so -- there might have been a group. 1 2 Combination of people. 2 O. Do you keep in contact with anybody that still 3 3 Because the process of me writing the works at Jansson? loan and working with the small business 4 4 A. One particularly that has remained after all this consultant, you know, was a process of about a 5 5 year and in that meantime, the shop had come in 6 time. 6 Q. Who is that? and a couple of bridal shops had already gone 7 7 out. And I felt it was too much of a risk and I 8 A. Sandy Dube. 8 9 MR. RUDY: She is not there anymore. didn't want to take that type of financial risk. 9 Q. Did you submit the SBA loan or --10 THE WITNESS: She is not there anymore? 10 A. No, I didn't. 11 MR. RUDY: Sorry. 11 Q. Are you married now? Q. Who is Sandy Dube? 12 13 A. Sandy -- you mean what did she do when she was at 13 A. Yes. Jansson? 14 Q. How many times have you been married? 14 15 Q. Yeah. 15 A. Once. 16 Q. Were you ever engaged before? 16 A. She wore many hats. She worked with the accounts. She helped out customer service. 17 17 A. No. Q. Any problems associated with your marriage? 18 Q. When was the last time you talked to Sandy? 18 19 A. A few weeks ago when my brother died. 19 A. No. 20 Q. What did you talk to Sandy about? 20 Q. Have you been in marriage counseling? 21 A. My brother's death. 21 A. No. 22 Q. It was about your brother? 22 O. Have you ever attempted suicide? 23 A. No. 23 A. Mm-hmm. 24 Q. Do you see Sandy on a regular basis or had you 24 Q. Have you ever had thoughts of suicide? Page 93 Page 91 seen her on a regular basis before that? 1 1 Q. Have you ever made a claim of any kind against an 2 A. We get together every few months. 2 employer prior to this lawsuit? 3 Q. Have you talked to her about this lawsuit? 3 4 4 A. No. 5 Q. Anyone else that you keep in contact with at 5 Q. Have you ever been convicted of a crime of any 6 kind? Jansson? 6 A. No. 7 A. Every -- periodically I might hear from Hollie 7 Prince just to say hi. Q. Have you ever been involved in any other 8 8 litigation? 9 O. Hollie Prince? 9 A. Yes. A. No. 10 10 11 Q. Court cases? 11 Q. Who did you talk to regarding your decision to bring this lawsuit other than your attorneys? 12 A. No. 12 13 Q. Who were your friends at Jansson? 13 A. My husband. 14 A. Define "friends." MR. PALMQUIST: Okay. Do you want to 14 take just a short break? I'm going to have her 15 Q. Were there any people at Jansson that you 15 socialized with outside of work? 16 mark some exhibits and we're going to run through 16 17 A. Maybe, you know, we went out to -- for a bite to 17 a few of those. eat or a drink after work but never actually made (Off the record.) 18 18 plans from home to meet. It was usually just a 19 (Recess.) 19 connection from work or extension of work. 20 (1/17/03 memo marked Exhibit No. 1.) 20 (2/16/00 note marked Exhibit No. 2.) 21 Q. Who did you have a drink with after work? 21 (6/23/01 note marked Exhibit No. 3.) 22 A. Pamela Greene, Paul Capasso, Lucia McDougall. 22 (10/5/01 letter marked Exhibit No. 4.) O. Anyone else? 23 23 A. No. Sometimes it was more than one person would 24 (10/10/01 Salary Continuance Plan

marked Exhibit No. 5.) (Response to Request for Family Medical Leave marked Exhibit No. 6.) (Charge of Discrimination marked Exhibit No. 7.) (Complaint marked Exhibit No. 8.) (Complaint marked Exhibit No. 9.) (Plaintiff's Rule 20(A) Disclosures marked Exhibit No. 10.) (Complaint marked Exhibit No. 9.) (Plaintiff's Rule 20(A) Disclosures marked Exhibit No. 10.) (Jansson Information for Employees marked Exhibit No. 1.) Ms. Patrick, Trm handing you whar's been marked as a Deposition Exhibit No. 1. Would you take a moment to review that, please? A. I'm sorry. This is 12222/0007 Is that what this is? I shat what that is? 2000? I mean, 18. Mr. Polbeiev so. A. Okay. Q. Can wou tell me what that is? A. Oh, okay. I'm just looking it over? I'm sorry. Q. Can you tell me what that is? A. Oh, okay. I'm just looking it over? I'm sorry. Q. Can you tell me what that is? Q. And does this document refresh your recollection as to what the dates were of that particular surgery? A. I'm confused. Q. I'will suggest that I think that that 12/22/00 is probably a mistake. It looks like the date's — 20. A. All right. I had a — I'll just brief you on this is the best way for me to "The second of Disclosures and the date's — 20. Right. That's what I'b looks like the date's — 20. Right. That's what I'b looks like the date's — 20. Right. That's what I'b looks like the date's — 20. Right. That's what I'b looks like the date's — 20. Right. That's what I'b looks like the date's — 20. Right. That's what I'b looks like the date's — 20. Right. That's what I'm suggesting but I don't know that. Mr. Pal-MQUIST: There isn't. No. Not yet. Q. Can you tell me what that is? Q. Tin is in the certification from your health care provider. Is this when you had an abdominal mysercomposition Exhibit to one of the supposition Exhibit No. 2. You what's been marked as persent of the particular supposition Exhibit No. 2. You what's been marked as persent of th	-	Page 94		Page 96
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tests during the fall. I had a miror surgical— in November of '99, which I did over the Thanksgiving weekend. And then that's when they determined I needed additional surgery, so that they would have been notified about it in '99 it was. It was scheduled for January, 2000. And then it goes from there. Okay? So that's what I believe this is. The date's confusing to me. Okay? So that's what I believe this is. The date's confusing to me. Okay? So that's what I believe this is. The date's confusing to me. Okay? So that's what I believe this is. The date's confusing to me. Okay? So that's what I believe this is. The date's confusing to me. Okay? So that's what I believe this is. The date's confusing to me. Okay? So that's what I believe this is. The date's confusing to me. Okay? So that's what I believe this is. The date's confusing to me. Okay? So that's what I believe this is. The date's confusing to me. Okay? So that's what I believe this is. The date's confusing to me. Okay? So that's what I believe this is. The date's confusing to me. Okay? So that's what I believe this is. The date's confusing to me. Okay? So that's what I believe this is. The date's confusing to me. Okay? So that's what I believe this is. The date's confusing to me. Okay? So that's what I believe this is. The date's confusing to me. Okay? So that's what I believe this is. The date's confusing to me. Okay? So that's what I believe this is. The date's confusing to me. Okay? So that's what I believe this is. The date's confusing to me. Okay? So that's what I believe this is. The date's confusing to me. Okay? So that's what I believe this is. The date's confusing to me. Okay? So that's what I believe this is. The date's confusing to me. Okay? So that's what I believe this is. The date's confusing to me. Okay? So that's what I believe this then then then then then then then then			2	fertility specialist in '99. I had a series of
4 (Charge of Discrimination marked 5 Exhibit No. 7.) 6 (Complainmant's Response to Respondents' 7 Position Statement marked Exhibit No. 9.) 9 (Plaintiff's Rule 26(A) Disclosures 10 marked Exhibit No. 10.) 11 (Jansson Information for Employees marked Exhibit No. 11.) 12 (Jansson Information for Employees marked Exhibit No. 11.) 13 (Jansson Information for Employees marked Exhibit No. 11.) 14 (A) Partick, I'm handing you what's been marked as Deposition Exhibit No. 1. Would you take a moment to review that, please? 15 (A) First No. 1. Would you take a moment to review that, please? 16 (A) First No. 1. Would you take a moment to review that, please? 17 (A) O. A. O. Kay. 18 (Complain manding you what's been marked this is? Is that what that is? 2000? I mean, 10 (00?) 19 (00?) 10 (10 (10 (10 (10 (10 (10 (10 (10 (10 (• •	3	tests during the fall. I had a minor surgical
Exhibit No. 7.) Complainant's Response to Respondents' Position Statement marked Exhibit No. 8.) Complaint marked Exhibit No. 9.) Position Statement marked Exhibit No. 9.) (Plaintiff's Rule 26(A) Disclosures marked Exhibit No. 10.) (Jansson Information for Employees marked Exhibit No. 11.) (Jansson Information for Employees marked as Deposition Exhibit No. 11.) Q. Ms. Patrick, I'm handing you what's been marked as a moment to review that, please? 12.		•	4	in November of '99, which I did over the
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(Complaint marked Exhibit No. 9.) (Plaintiff's Rule 26(A) Disclosures marked Exhibit No. 10.) (Jansson Information for Employees marked Exhibit No. 11.) (Jansson Information for Employees marked Exhibit No. 10.) (Jansson Information for Employees marked Exhibit No. 11.) (Jansson Information for Employees marked Exhibit No. 10.) (Jansson Information for Employees marked Exhibit No. 11.) (Jansson Information for Employees is. The date's confusing to me. 14			7	they would have been notified about it in '99 it
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